

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue
Seattle, Washington 98101

October 5, 2004

Reply To

Ref: 03-046-AFS

Attn Of: **ETPA-O88**

Steve E. Williams, Acting Supervisor
U.S. Forest Service
Nez Perce National Forest
Route 2, Box 475
Grangeville, ID 83530

Dear Mr. Williams:

The U. S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (EIS) for **Red Pines Project** (CEQ No. 040394) in accordance with our responsibilities under the National Environmental Policy Act (NEP A) and Section 309 of the Clean Air Act. Section 309, independent of NEPA, specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions and the document's adequacy in meeting NEPA requirements.

The EIS proposes to implement fuel reduction activities and watershed improvement activities within the Red Pines area of the Red River Ranger District of the Nez Perce National Forest. The Red Pines Project would treat existing and potential fuel loads to reduce the effects of potential large-scale wildfire by removing dead and dying trees, reducing timber stand densities, reducing ladder fuels and maintaining fire-resistant tree species. The EIS identifies three action alternatives and Alternative B as the Proposed Action. The EIS proposes to amend the Forest Plan to allow a one-time exceedance of upward trend in aquatic condition requirements in some watersheds where achievement is not likely given project objectives and allow fuel hazard reduction and watershed improvement activities to be implemented concurrently with aquatic improvement activities as long as an upward trend is indicated.

We support the overall objectives of the watershed improvement activities proposed in the EIS. The obliteration and maintenance of roads, channel reconstruction, riparian planting and stream crossing upgrades, when conducted properly, should provide some significant long term improvements to the watersheds in the Red Pines project area.

Our concerns with the EIS are the potential increases in sediment delivery to waterbodies, compliance with water quality standards, inconsistency with the Total Maximum Daily load for the South Fork Clearwater River, watershed impacts associated with the Proposed Action (Alternative B), impacts on Endangered Species Act (ESA) listed salmonids and the uncertainties associated with NEZSED and FISHSSED modeling projections. Detailed comments discussing our concerns are provided in the accompanying attachment.

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Response 5-1 Proposed Action, objectives.
Thank you for your support.

Response 5-2. water quality, TMDL, ESA listed species, model uncertainties. See the following responses, and also see responses 4-12 and 14-40. Each of these concern areas have been addressed in the FEIS, Chapter 3 or Appendix H. Please see the response to Comment 4-14 pertaining to sediment yield and TMDLs. Impacts to listed salmonids are disclosed in the FEIS and in the associated BA/BE and Biological Opinions. Model limitations are acknowledged and disclosed in Chapter 3 and Appendix H of the FEIS. These limitations are overcome by supplementing the model results with other data and analyses.

We have assigned a rating of EC-2 (Environmental Concerns -Insufficient Information) to the draft EIS based on the action alternatives. This rating and a summary of our comments will be published in the *Federal Register*. A copy of the rating system used in conducting our review is enclosed for your reference.

Thank you for the opportunity to review this draft EIS. If you would like to discuss these issues, please contact Mike Letourneau at (206) 553-6382.

Sincerely,

/s/ Christine B. Reichgott

Christine Reichgott, Manager
NEP A Review Unit

Enclosures

cc:

C. Fletcher, USFWS
J. Kahn, NOAA-Fisheries
D. Stewart, IDEQ
M. Benker, IDF&G
S. Althouse, Nez Perce Tribe

Response 5-3. Rating.
Acknowledge comment.

**EPA's Detailed Comments
Red Pines Project Environmental Impact Statement**

Sediment Yield and Water Quality

Road construction, mining, timber harvest and grazing have increased surface erosion rates beyond those associated with natural watershed disturbances resulting in sediment yields in the Red River watershed that are as much as 39 percent over natural levels. The Red River watershed and project subwatersheds are considered to be at high risk of cumulative sediment effects due to past impacts in the watershed and low gradient stream channels. Moose Butte Creek and Lower Main Red River subwatersheds currently exceed Forest Plan guidelines for sediment yield. In addition, the Red Pines Project activities will impact Little Moose Creek, Red River and the South Fork of the Clearwater River, waterbodies that have been listed for temperature and sediment by Idaho Department of Environmental Quality in 2003 as impaired under Section 303(d) of the Clean Water Act. The EIS states that project activities would result in sediment yield increases as high as 34 percent in some waterbodies (page 111-43).

Idaho water quality standards (WQS) contain temperature and sediment criteria that prevent degradation of surface waters from anthropogenic activities.. These criteria are specific to the resident biota and their activities (e.g., spawning, rearing) and are applicable temporally and spatially within a given waterbody. In addition, the Red River has been designated as a Special Resource Water by the state of Idaho and consequently, the Red Pines project is required to perform an Antidegradation Tier II analysis to demonstrate that applicable WQS and beneficial uses will be met.

The South Fork Clearwater River Subbasin Assessment and Total Maximum Daily Loads (TMDL) provides sediment (Total Suspended Solids (TSS) and temperature (shade) load allocations for waterbodies that will be impacted by Red Pines Project activities. To meet these allocations, the TMDL requires that sediment loads from nonpoint sources be reduced by 25 percent in the upper South Fork Clearwater watershed, and that shade be increased to specific levels in each reach of the Red River and its tributaries. The EIS does not discuss how TMDL sediment load allocations will be met with the increased sediment yields from Red Pines Project activities. Nor does the EIS discuss if the Red Pines Project activities will result in improvements in shade conditions or exceedances of Idaho water quality standards. The EIS needs to demonstrate that project activities will be consistent with South Fork Clearwater River TMDL requirements and Idaho water quality standards.

The EIS needs to demonstrate that the short term increases in sediments from the Red Pines Project is consistent with Idaho Department of Environmental Quality (IDEQ) draft Guidance for Forest Practices Discharging Sediment into 303(d) Listed Waterbodies. This guidance calls for sediment reduction projects to be completed within three to five years of the timber related activities causing sediment discharge. Also, for those waterbodies not on a 303(d) list, a demonstration must be made that the sediment impacts from the project will not cause a reduction in water quality that would impair existing beneficial uses.

Response 5-4. Water quality, temperature, sediment analysis.

Recent consultations with USEPA and IDEQ have indicated that the Antidegradation Tier II analysis is not applicable to this project. This procedure applies in the case of waters exceeding State Water Quality Standards. In the case of Red River and the South Fork Clearwater River, the TMDLs supplant the antidegradation provisions.

Response 5-5. Water quality, temperature, sediment, TMDL consistency.

Additional analysis was provided in the FEIS to further address TMDL requirements and Idaho Water Quality Standards. Consultation is underway with the IDEQ to determine whether the new Alternative E in the FEIS complies with the South Fork Clearwater River TMDLs

Response 5-6. Water quality, short term increases, 303d Guidance, consistency.

The FEIS has analyzed the project with respect to applicable provisions of the Idaho State Water Quality Standards. Consultation is underway with the IDEQ to determine whether the new Alternative E in the FEIS complies with the South Fork Clearwater River TMDLs and other applicable provisions of the Standards.

Sediment yield predictions were developed utilizing the NEZSED model based on proposed fuel reduction activities, temporary road construction, road reconstruction or existing roads, and prescribed fire activities. The EIS states that the only watershed improvement project that the NEZSED model accounts for is road decommissioning activities. While other watershed improvement projects would cause short term localized increases in sediment, they are not accounted for in the sediment yield values presented in the EIS (page III-58). Of the 90 miles of proposed road reconditioning only 19.8 miles were accounted for in the NEZSED predictions of increased sediment loading to waterbodies in the project area. The remaining mileage of reconditioned road activity was regarded as part of the existing condition. In addition, the NEZSED model does not account for recent harvest, road building and grazing activities on private land. The EIS should discuss in more detail the accuracy of the NEZSED model to predict sediment yields in each of the watersheds within the project area and the associated uncertainties of those predictions. The EIS should identify those watersheds or waterbodies for which the model over predicts and under predicts sediment yields based on all modeling studies conducted to date. In addition, the EIS should discuss how activities not accounted for in the NEZSED predictions are accounted for in mitigation measures and best management practices (BMPs).

The EISs should also describe how roads will be closed. Road closures can range from administrative (signage or barricading at the road entrance to prevent off-road vehicles from entering) to obliteration, revegetating, and stabilizing the road to reduce the risk of mass wasting and to improve wildlife habitats.

Response 5-7. water quality, sediment yield, NEZSED, activities not modeled, mitigation, all activities.

The private land activities have been updated and are incorporated in the NEZSED results displayed in the FEIS. Over and under-predictions of the sediment model, based on tests against sampled field data, are summarized in Appendix H. Sediment yield from activities not modeled by NEZSED are analyzed and discussed in Chapter III, Section 3.5 of the FEIS.

Response 5-8. Road closure, access, enforcement.

Refer to Chapter III, Transportation System, Section 3.16, Environmental Consequences and Appendix I of the FEIS.

The existing roads that the project uses for harvest activities would retain the same closure method that is currently in place. The access prescription would not change throughout the activities.

Temporary roads that have been constructed and are being used will be closed by signing and monitored daily by project personnel during the activities. At the end of each season, if not decommissioned, the road will be waterbarred and closed with an earth berm. All temporary roads will be decommissioned within three years by full recontouring. Roads that are decommissioned by recontouring are generally not gated or signed. Whenever possible the beginning of a decommissioned road is designed to look like no road ever existed there. In addition, any possible access is blocked by placing brush or constructing high earth banks.

In addition, the EISs should describe what enforcement measures will be utilized and the monitoring program that will be implemented to ensure that road closures are effective.

Fisheries

Forest Plan Amendment 20 (PACFISH) permits fuel treatment and fire suppression strategies, practices and actions in Riparian Habitat Conservation Areas (RHCA) as long as Riparian Management Objectives (RMOs) are attained and there is minimum disturbances of riparian ground cover and vegetation. In addition, it must be demonstrated that fuel and fire strategies are needed to prevent damage to long term ecosystem function, listed anadromous fish, or designated critical habitat. The Red River is currently designated a priority watershed for chinook salmon, steelhead and bull trout under the Endangered Species Act (ESA). The NOAA Fisheries and U.S. Fish and Wildlife Service Biological Opinions for Forest Plans include a sediment RMO of less than 20 percent surface fines in spawning habitat or less than 30 percent cobble embeddedness in rearing habitat.

While the Red River watershed contains habitat with very high potential to support anadromous and resident fish, increased levels of deposited sediment, low pool number and quality, high stream temperatures, and lack of large woody debris are the primary factors limiting aquatic habitats. The EIS states that under all action alternatives there will be short term increases in sediment production from vegetative treatments, temporary road construction, road reconditioning, road decommissioning, in-channel improvements, and stream crossing upgrades (page 111-75). These short term increases in sediment will result in adverse effects on trout, salmon and their habitats.

Response 5-8b. roads, enforcement.

Existing gates, signing, and monitoring by project personnel will be used to enforce closure methods while activities take place on the project. When the project is completed the permanent closures will be put in place. These include barriers, berms, and decommissioning.

Please refer to Response 5-8 and Response 13-55 for further details.

Response 5-9. fish habitat, RMO, RHCA

Neither the South Fork Clearwater subbasin nor Red River are included in recently designated critical habitat for bull trout (Federal Register, Vol. 69, No. 193, 2004). Critical habitat to date is not designated for steelhead trout, although Red River was proposed as critical habitat on December 14, 2004. This is discussed in greater detail in Section 3.1.5.2 of the FEIS.

The effects of the No Action alternative on Fisheries resources are addressed in the FEIS under all indicators related to fish and watershed conditions. Effects from future wildfires and wildfire suppression actions may be less than if there were no fuel reduction, but it is impossible to predict or quantify the extent to which fuel reduction may affect when, where, and how intense a wildfire might burn under varying conditions such as weather and suppression response. Fire effects would be less in areas where fuel reduction is conducted.

Consistent with direction provided in FSM 2670 and Section 7 of the Endangered Species Act, we have completed the consultation process for listed anadromous fish and bull trout with the appropriate regulatory agencies.

The FISHSED model was utilized to predict short term increases in cobble embeddedness and reductions in summer and winter rearing capacity using predictions from the NEZSED modeling. The FISHSED modeling results indicate that there would be significant increases in cobble embeddedness which would translate into reduced summer and winter rearing capacity. Changes would be greatest for Ditch Creek where cobble embeddedness is predicted to increase by 10 percent (page III-90). The cobble embeddedness values presented in Table III-21 indicate that all but two of the prescription watersheds currently exceed the Forest Standard 30 percent embeddedness criteria (some as high as 66 percent) and that the action alternatives will increase the cobble embeddedness in all but Dawson Creek and Trapper Creek watersheds. The EIS needs to identify what parts of the watersheds utilized for spawning and rearing do not currently meet the RMO of less than 20 percent surface fines in spawning habitat and less than 30 percent cobble embeddedness in rearing habitat. Also, the EIS needs to identify the spawning and rearing habitats that will not meet the cobble embeddedness RMO under each of the action alternatives.

The South Fork Clearwater River TMDL includes a surrogate target of a decreasing trend in fine sediment levels (cobble embeddedness, depth fines, surface fines). This surrogate target is set as a monitoring tool to verify that sediment reduction activities in the main stem drainages and in other contributing watersheds are reducing sediment in the river. The intent of the decreasing trend target is to provide an indicator of the effectiveness of the Best Management Practices (BMPs) or other sediment reduction activities. It is recognized that uncertainty exists in establishing the most appropriate substrate sediment level for comparison. Therefore, the goal of TMDL is a statistically significant decreasing trend in fine sediment levels (cobble embeddedness, depth fines, surface fines). The TMDL applies this goal to the entire upper South Fork Clearwater River, including the reach where the Red River enters. The EIS needs to discuss how project activities and associated BMPs will meet this goal. 3

The EIS states that it is possible that the sediment effects from future wildfires and their suppression activities would be less than if there were no fuel reduction, but it is impossible to predict or quantify the extent to which fuel reduction may affect when, where and how intense a wildfire might burn. Also, it is difficult to predict whether a wildfire in the absence of fuel treatments would result in more significant effects to the watershed than wildfire after fuel treatments (III-90). Without an accurate understanding of what the potential impacts the watershed would experience without fuel reductions, one is unable to determine if the PACFISH RMO that permits activities in RHCA has been met. The EIS needs to demonstrate that the impacts to the watersheds, in particular fish species, would be greater without fuel treatments than with fuel treatments.

Response 5-10. Fish habitat, spawning and rearing location, cobble embeddedness, standards.

Cobble embeddedness and percent fine data where available are displayed in Table III-36 for subwatersheds potentially affected by the project. As disclosed in this table, the data describing the existing condition for all subwatersheds suggest the Forest Plan Biological Opinion sediment RMO of 20 percent surface fines in spawning habitat and 30 percent cobble embeddedness in rearing habitat is exceeded widely across the Red River watershed.

The discussion of effects to the deposited sediment indicator has been changed in the FEIS. The discussion in the FEIS has incorporated additional direction in FISHSED related to the magnitude of predicted changes in substrate condition and identification of the subwatersheds where percent change in condition would exceed 10 percent. This discussion begins on page III-19.

Response 5-11. water quality, TMDL, surrogate target goals

Please see response to comment 4-14.

Response 5-12. fisheries, RMO, RHCA, alternative effects.

The effects of the No Action alternative on Fisheries resources are addressed in the FEIS under all indicators related to fish and watershed conditions (Sections 3.1.7.2 and 3.5.4.2). Effects from future wildfires and wildfire suppression actions may be less than if there were no fuel reduction, but it is impossible to predict or quantify the extent to which fuel reduction may affect when, where, and how intense a wildfire might burn under varying conditions such as weather and suppression response. Fire effects would be less in areas where fuel reduction is conducted, as discussed in the Fire/Fuels section.

See also Responses 4-7 and 4-13 to address PACFISH issues.

Harvest of trees, as well as other activities in RHCAs, was identified as a significant issue in project scoping and drove alternative development. Salvage harvest in RHCAs is not included in Alternatives C, D, and E.

Proposed Action -Alternative B

The EIS identifies three action alternatives and Alternative B as the Proposed Action. The relative ranking of alternatives in the EIS consistently ranks Alternative B as the worst for environmental consequences (page III-114). The EIS ranks Alternative B worst in maximizing soil restoration and minimizing new soil disturbances, soil compaction, impacts on soil chemistry and biological properties, mass erosion, and loss of soil wood. In addition, Alternative B would result in the greatest amount of irreversible and irretrievable effects.

We understand through conversations with staff at the Nez Perce National Forest that the Final EIS will include an alternative that has less timber harvest, limited activities in the RHCAs, fewer temporary road miles, and more required aquatic improvements, resulting in less short term impact and more long term improvement than the Proposed Action. Such an alternative is predicted to result in upward trends in aquatic conditions and better meet Forest Plan objectives and TMDL allocations. EPA supports this effort and recommends that the Forest Service develop and select an alternative that excludes fuel hazard reduction activities within RHCAs and minimizes temporary road construction particularly in high sediment yield subwatersheds to better comply with TMDL allocations. This alternative should accelerate water quality and fish habitat improvements by minimizing ground-disturbing activities and emphasizing watershed improvement activities in a greater number of watersheds in the proposed project area. EPA recommends that the EIS demonstrates that there will be improvements in surface fines and cobble embeddedness and that a monitoring plan be developed to validate predicted effects from project activities.

The levels of existing and future downed wood in the Red Pines Project area will have a significant impact on sediment loading and the long-term health of aquatic habitat in the project area and in downstream areas. Montgomery et. al. (2003) showed that the sediment retained on site behind large downed wood may be fifteen times greater than what is transported downslope. In addition, large wood is critical for the beneficial deposition of sediment and other substrate within stream channels. Large wood removed from the system will take multiple decades or longer to replace and may cause long-term, adverse impacts to water quality and fisheries. Therefore, EPA recommends that the project maximize the retention of downed wood on slopes and within intermittent streams in drainages with high erosion potential.

Tribal Consultation and Coordination

The proposed project could affect historical or traditional cultural places of importance to the area's Native American communities. The EIS needs to identify historic resources if applicable, and assure that treaty rights and privileges are addressed appropriately. If the proposed project will have impacts on Native Americans, the development of the EIS should be conducted in consultation with all affected tribal governments, consistent with Executive Order (EO) 13175 (Consultation and Coordination with Indian Tribal Governments). EO 13175 states that the U.S. government will continue "to work with Indian tribes on a government-to-government basis to address issues concerning Indian tribal self-government, trust resources, and Indian tribal treaty and other rights."

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Response 5-13. Alternatives, Alternative E. Effects analysis for improving trend, water quality, fisheries

Comment acknowledged. No harvest or removal of fuels would occur in streamside RHCAs in Alternatives C, D, or E.

Response 5-14. Soils, down wood, water quality, fish, high erosion potential. The role of down wood is considered in detail in both the soils and watershed sections of Chapter III. On Tables II-2 and II-3, in the FEIS, design and mitigation measures provide for retention of live trees, snags, and down wood in order to assure existing and recruitable down wood. Monitoring (Appendix I; FEIS) requires monitoring during the course of activities to ensure that these elements are retained according to the requirements. The surface soils in most of the project area have low to moderate surface erosion hazard and the volcanic ash surface soil buffers against erosion on all but steep slopes or some low elevation areas where the ash surface layer is mixed. In all alternatives except B, there would be no tree removal in PACFISH riparian areas (except at stream crossings of roads). This protection includes intermittent streams.

See also Response 4-1.

Response 5-15. Nez Perce Tribe Consultation, documentation. Please see FEIS, Section 3.15 Heritage Resources for analysis relating to historic and cultural resources and the proposed project.

The Forest has met with the Nez Perce tribe on several occasions. Recently on April 5th, 2005, Steve Williams met with the Nez Perce Tribal Executive Committee, and members of the Natural Resources Committee. The Forest will continue to consult with the tribe on this project. See Chapter III, Section 3.22 and Chapter IV, Section 4.3.2.

Documentation of these consultations should be included in the EIS. Consistent with the July 28, 1999 memorandum from the Council on Environmental Quality (CEQ) to Heads of Federal Agencies, we strongly urge the Forest Service to consider inviting affected Tribal governments to participate in the EIS development process as cooperating agencies. This would provide for the establishment of a mechanism for addressing intergovernmental issues throughout the EIS development process.

Environmental Justice

The EIS does not provide any analysis of the communities that will be impacted by the proposed actions nor does it describe how it was determined that low-income or minority communities would not be disproportionately impacted. The EIS should disclose what efforts were taken to meet environmental justice requirements consistent with Executive Order (EO) 12898 (*Federal Actions to Address Environmental Justice in Minority and Low-Income Populations*).

The EIS should describe the efforts and criteria utilized to identify low income and people of color (minority) communities that may be impacted by the proposed project. The EIS should provide demographic analyses that describes the racial and income profile of the communities that would be impacted by the proposed project and identify those communities that have significant populations of low income and people of color. In addition, the EIS needs to provide a comprehensive accounting of all impacts on these communities, including (but not limited to) cumulative and indirect impacts. The EIS also needs to determine if the impacts to low income and people of color communities will be disproportionately higher than those on non-low income and non-people of color communities. For such a determination, the EIS must identify a reference community, provide a justification for utilizing this reference community, and include a discussion of the methodology for selecting the reference community.

If it is determined that low income or people of color communities will bear disproportionately high and adverse effects, the EIS should describe the efforts that were taken to assure that these communities have had opportunity to provide meaningful input into the decisions being made about the project. The EIS should describe what was done to inform the communities about the project and the potential impacts it will have on their communities (notices, mailings, fact sheets, briefings, presentations, exhibits, tours, news releases, translations, newsletters, reports, community interviews, surveys, canvassing, telephone hotlines, question and answer sessions, stakeholder meetings, and on scene information), what input was received from the communities, and how that input was utilized in the decisions that were made regarding the project.

Response 5-16. Communities, low income, minority, input to project, impact from project.

The FEIS, in the Social/Economic section (Chapter 3, Section 3.18.5), discusses the local community of Elk City and the impacts of the actions on the community.

Affected communities and individuals were given opportunity to comment and participate in the planning process for this project. Public scoping and public involvement was extensive, including field trips and open houses to discuss and interact with the communities on the proposed action.

Response 5-17. Inform communities.

See the FEIS, Chapter IV, Section 4.3 for a summary of public involvement and comments received on this project. The project file contains the actual documents that were distributed, and notes.

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action*
Environmental Impact of the Action**

LO -Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC -Environmental Concerns

EP A review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

Response 5-18. Rating
Acknowledge rating for EIS.

EO -Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU -Environmentally Unsatisfactory

EP A review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 -Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 -Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Response 5-19. Rating.
Acknowledge rating for EIS

Category 3 -Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

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